## UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

DANA M.NULL, : BK. NO. 4-11-04263

:

Debtor : CHAPTER 13

## CERTIFICATION OF SERVICE

Charles A. Szybist, Attorney for Debtor, does hereby certify that he served a true and correct copy of Petition, Notice of proposed modifications to the Confirmed Fifth Amended Chapter 13 Plan and proposed Order on the United States Trustee and the PA Department of Revenue by electronic bankruptcy e-mail and upon PSECU, PO Box 67013, Harrisburg, Pennsylvania, 17106-7013, by placing a true and correct copy of same in the United States mail, first-class, postage prepaid, at Williamsport, Pennsylvania, this 25<sup>th</sup> day of January 2017.

Respectfully submitted:

/s/ Charles A. Szybist\_

CHARLES A. SZYBIST, ESQUIRE

Attorney for Debtor

423 Mulberry Street Williamsport, PA 17701

Telephone No.: (570) 326-0550

## UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

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DANA M. NULL, : BK. NO. 4-11-04263

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Debtor : CHAPTER 13

## NOTICE TO CREDITORS AND OTHER PARTIES IN INTEREST

Notice is hereby given that:

Debtor has filed a petition to modify her confirmed Fifth Amended Plan, which said Petition calls for payment and actions already made and which include the following:

- 1. Payment in full and settlement of the first and second mortgage obligations on debtor's former residence known as 1428 Woodward Avenue, Lock Haven, Clinton County, Pennsylvania, inside and outside the Plan.
- 2. Payment of all secured and priority IRS and PA Department of Revenue taxes due and owing outside the Plan.
- 3. Debtor will be excused from borrowing \$45,000.00 from the family of James Null.
- 4. Debtor has already paid the sum of \$6,838.58 as a priority claim to the PA Dept. of Revenue from the proceeds of the sale of Debtor's real estate and mineral rights. Debtor will be excused from payment of the remaining \$1,479.00 balance because said claim is unsecured and there are insufficient monies available to pay said claim in full.
- 5. Debtor shall not be obligated to pay any adequate protection payments on the mortgages as the mortgages are settled and paid in full.
- 6. Debtor was never an officer or had any management function with Log Cabin Manufacturers, LLC, etc, and there is no value for Debtor.
- 7. Debtor is abandoning her interest in ANC Trust LLC, owner of Route 56 real estate, bar and restaurant, and the option to purchase the business, as well as the ANC Trust and the 2003 inoperable Jaguar as burdensome and of inconsequential value to the Estate.
- 8. Debtor, by the actions set forth above, will have paid all known taxes under the plan, all administrative and secured debtors under the plan, leaving two small general unsecured, non-priority claims remaining against her.

Notice is hereby given that unless objections are entered to the petition to modify confirmed plan within twenty-one (21) days of the date of this notice, an appropriate Order may be entered. If any objections are made, the matter will be heard on March 24, 2017,

Courtroom #1, 4<sup>th</sup> floor, US. Courthouse, 240 West Third Street, Williamsport, Pennsylvania.

Anyone objecting to said petition to modify confirmed Fifth Amended Chapter 13 Plan must notify the Clerk, United States Bankruptcy Court, Max Rosenn U.S. Courthouse, 197 South Main Street, Wilkes-Barre, Pennsylvania, 18701, with a copy to Debtor's attorney, Charles A. Szybist, Esquire, 423 Mulberry Street, Williamsport, Pennsylvania, 17701.

/s/ Charles A. Szybist CHARLES A. SZYBIST, ESQUIRE 423 Mulberry Street Williamsport, PA 17701 Telephone No.: (570) 326-0559

DATED: January 25, 2017